

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND DIVISION

<b>In re:</b>	<b>§ Chapter 11</b>
CCNG ENERGY PARTNERS, LP	§ Case No. 15-70136
CCNG ENERGY PARTNERS GP, LLC	§ Case No. 15-70141
MOSS BLUFF PROPERTY, LLC	§ Case No. 15-70137
TRINITY ENVIRONMENTAL	§
CATARINA SWD, LLC	§ Case No. 15-70138
TRINITY ENVIRONMENTAL SERVICES, LLC	§ Case No. 15-70139
TRINITY ENVIRONMENTAL SWD, LLC	§ Case No. 15-70135
TRINITY ENVIRONMENTAL	§
TITAN TRUCKING, LLC	§ Case No. 15-70140
<b>Debtors</b>	<b>§ Joint Administration Requested</b>

**MOTION FOR JOINT ADMINISTRATION OF CASES**

TO THE HONORABLE RONALD B. KING, CHIEF U.S. BANKRUPTCY JUDGE:

The above-captioned debtors and debtors-in possession (collectively, the “Debtors”) file this Motion for Joint Administration of Cases, as follows:

1. On October 12, 2015, each of the Debtors filed a Voluntary Petition for Relief under Chapter 11 of Title 11 of the United States Code. The Debtors are operating their business as Debtors-in-Possession, and no trustee or examiner has been appointed.
2. The Court has jurisdiction and authority over this matter pursuant to 28 U.S.C. §§ 157 & 1334.
3. By this Motion, the Debtors seek entry of an order authorizing and directing the joint administration of these cases under *In re CCNG Energy Partners, LP*, Case No. 15-70136.
4. Bankruptcy Rule 1015(b) authorizes this Court to enter an order directing the joint administration of these cases. Moss Bluff Property, LLC, Trinity Environmental Catarina SWD, LLC, Trinity Environmental Services, LLC, Trinity Environmental SWD, LLC, and Trinity

Environmental Titan Trucking, LLC are all wholly owned subsidiaries of CCNG Energy Partners, LP. CCNG Energy Partners GP, LLC is the general partner of CCNG Energy Partners, LP. CCNG Energy Partners, LP, Trinity Environmental Services, LLC, and Trinity Environmental SWD, LLC are all primary obligors on the approximately \$176 million debt (the “Guggenheim Debt”) to the lenders represented by Guggenheim Corporate Funding, LLC, as administrative agent, that precipitated the bankruptcy filings. Moss Bluff Property, LLC, Trinity Environmental Catarina SWD, LLC, and Trinity Environmental Titan Trucking, LLC guaranteed and pledged assets securing the Guggenheim Debt.

5. Debtors believe that many of the issues in the cases will be the same.

6. Joint administration of these cases is appropriate under the circumstances and will aid in the efficient administration of the cases. The joint administration will save time and expense by making it unnecessary to file duplicate motions and conduct duplicate hearings. Moreover, the reduction in costs from joint administration will enhance the estates, thereby benefiting all creditors.

7. Debtors further request that: (a) the Clerk of the Court maintain one docket for all pleadings filed in this case; (b) the Clerk of the Court maintain one service list for the service of the pleadings, orders, and notices in these cases; and (c) all pleadings and other papers be under filed under one case number.

8. Notwithstanding the foregoing, the Clerk of the Court should maintain a separate claims register or claims file for each case.

9. Accordingly, Debtors request that the Court issue the proposed order attached as **Exhibit A** hereto directing the joint administration of the cases under *In re CCNG Energy Partners, LP*, Case No. 15-70136. Debtors also request general relief.

Respectfully submitted,

TAUBE SUMMERS HARRISON  
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By: /s/ Mark C. Taylor

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**PROPOSED ATTORNEYS FOR  
DEBTORS AND DEBTORS IN POSSESSION**

**CERTIFICATE OF SERVICE**

The foregoing notice was served on all persons on the attached Service List via First Class Mail on October 13, 2015.

/s/ Mark C. Taylor

Mark C. Taylor